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April 21, 2025

The Honorable Maryellen Noreika  
United States District Court  
for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Room 4324, Unit 19  
Wilmington, DE 19801-3555

*VIA ELECTRONIC FILING*

Re: Qualcomm Incorporated, et al. v. ARM Holdings PLC,  
C.A. No. 24-490 (MN)

Dear Judge Noreika:

Qualcomm writes to request a briefing schedule on a motion to compel discovery and to update the Court on the status of document production.<sup>1</sup>

The Scheduling Order includes a May 1 deadline for substantial completion of document production and a July 11 close of fact discovery (D.I. 44). It also requires that the parties “produce documents on a rolling basis” and “not wait until the substantial completion of document production before producing documents.” D.I. 44 ¶ 7(b). Qualcomm served its first set of requests for production on January 21, followed by additional requests on February 21, April 2, and April 16. See D.I. 42, 60, 93, 104. Arm, however, has yet to produce a single document or even to say when it plans to do so.<sup>2</sup> Arm has also limited the scope of its production to exclude materials Qualcomm believes are highly relevant.

Arm’s failure to produce documents is hindering Qualcomm’s ability to prosecute its case, including preparing for depositions, which must begin soon in order to complete fact discovery by

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<sup>1</sup> The parties notified the Court of the discovery dispute by phone on April 3, and followed up by email on April 14.

<sup>2</sup> In response to Arm’s RFPs, Qualcomm has made substantial document productions of over 34,000 documents on April 1 and April 18. Qualcomm intends to make a third production on May 1.

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July 11. The parties have also reached an impasse on many of these disputes and require the Court's assistance in resolving them.

Qualcomm respectfully requests that the Court set a briefing schedule for its motion to compel.

Respectfully,

*/s/ Jennifer Ying*

Jennifer Ying (#5550)

cc: Clerk of the Court (via hand delivery)  
All Counsel of Record (via CM/ECF and e-mail)